

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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CASE NO. 16-cv-3586 (DWF/HB)

Allen Beaulieu Photography,

Plaintiff,

v.

Clint Stockwell, an individual; Studio  
1124, LLC, a Minnesota limited liability  
company, Thomas Martin Crouse, an  
individual, Charles Willard "Chuck"  
Sanvik, an individual and Does 3 through  
7,

**DECLARATION OF  
MARY B. BEEMAN**

Defendants.

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Mary B. Beeman, being first duly sworn states as follows:

1. I am a Legal Assistant at Hellmuth & Johnson, PLLC and have assisted Mick Spence, counsel for Plaintiff, with the above-captioned matter since its inception.
2. In my capacity as Legal Assistant, I have reviewed information, data, photographs and communications produced in early discovery between relevant parties to this litigation.
3. On April 27, 2016, Defendant Clint Stockwell sent an email to Defendant Charles Sanvik, with two attachments: 1) "B4 Release.pdf;" and 2) an mp4 video titled "B42.mp4." Attached hereto as **EXHIBIT A** is a true and correct copy of the April 27, 2016 email and a copy of the attachments (please note the mp4 video has been saved screen-by-screen and displays approximately 147 photographs).

4. Multiple original photographs included as copies in this mp4 video were not returned to Plaintiff by Defendant Stockwell on October 24, 2016.

5. On October 7, 2016, Defendant Clint Stockwell sent an email to Defendant Charles Sanvik attaching an October 6, 2016 demand letter from Mick Spence, counsel for Plaintiff, with the message ***“Guess this project is on the back burner. Got this last night. Well on to bigger and greater things.”*** (emphasis added). Attached hereto as **EXHIBIT B** is a true and correct copy of the October 7, 2016 email and its attachment.

6. On November 9 2016, Defendant Clint Stockwell sent an email to Defendant Charles Sanvik attaching one PDF document and copies of 46 emails related to Plaintiff's Prince photographs. Attached hereto as **EXHIBIT C** is a true and correct copy of the November 9, 2016 email.

7. Also on November 9 2016, Defendant Clint Stockwell sent another email to Defendant Charles Sanvik, attaching a “zip” drive named “e mails from tom and al.zip.” The emails in the .zip drive involved Defendant Thomas Crouse and Plaintiff Al Beaulieu. Attached hereto as **EXHIBIT D** is a true and correct copy of the November 9, 2016 email.

8. Also during my involvement with this case, I have reviewed data provided to us by the court-approved ESI expert (DOC 15) Computer Forensic Specialists (“CFS”), including communications obtained from the devices of Mr. Stockwell and Mr. Beaulieu.

9. Between December 7, 2016 and August 7, 2017, Defendant Sanvik sent 11 text messages to Mr. Beaulieu related to projects involving Plaintiff's Prince


photographs, including one on April 26, 2017, as follows: *"Sitting here with Jimmy. We want to talk sometime! Pepe too. We have a proposal put together which is quite cool."*

In another exchange, Plaintiff Beaulieu tells Defendant Sanvik directly to tell Defendant Stockwell to return all of Plaintiff's photographs. Attached hereto as **EXHIBIT E** is a true and correct copy of a text message conversation between Defendant Charles Sanvik and Plaintiff Allen Beaulieu (as provided by CFS).


10. On November 11, 2016 Mick Spence and Charles Sanvik had a 39 minute telephone call to discuss the matters involving this litigation. That phone call was recorded by me at our office and I personally prepared a transcript of that call. Attached hereto as **EXHIBIT F** is a true and correct copy of relevant portions of the telephone call transcription.

11. During the period of time between April 27, 2016 and October 24, 2016 (the date Mr. Spence picked up photographs from Defendant Stockwell), Plaintiff Beaulieu made 8 separate requests to Defendant Stockwell to return his photographs. During this same time frame, communications between Defendants Stockwell and Sanvik actively continued in the form of phone calls, emails and text messages.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
Mary B. Beeman

Subscribed and sworn to before  
me this 27<sup>th</sup> day of November, 2017

  
Notary Public

